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THE FULL PICTURE
America's Immigration Enforcement Machine

A Unified Intelligence Dossier

Scope: Two interconnected investigations into the operational infrastructure of U.S. immigration enforcement (2025–2026)

Part I: The 287(g) Per-Child Bounty System — Who backs it, who profits, where the kids go
Part II: The CMS–ICE–Palantir Data Bridge — How millions of health records became deportation targeting tools
Part III: The Convergence — How these systems connect as a single enforcement architecture

Analysis Date: July 19, 2026
Methodology: Multi-agent adversarial analysis with independent fact verification across specialized research sources

■ VERIFICATION STANDARD

Every factual claim in this dossier was independently verified against court filings, investigative journalism, public records, and legal documents before analysis was conducted. Where analysis extends beyond verified facts, it is clearly marked as inference or assessment.

This is not a policy brief. It is a material map of the machine: funding flows, contractual incentives, data pipelines, private profit centers, and the legal architecture that converts administrative gaps into state violence against children and families.

PART I: THE 287(g) PER-CHILD BOUNTY SYSTEM

The Source: Maxwell Commons

Andrew Thrasher is an independent researcher, consultant, and data analyst with roughly a decade of experience as a technology adviser to immigration law firms. He is explicitly a non-attorney who brings data transparency to the U.S. immigration system. Through Titus Legal Design (founded ~2022) and the Maxwell Commons Substack, he maintains interactive trackers and maps of the 287(g) program. His March 2026 Caney Valley Schools exposé forced ICE to scrub data from its public records. Cited by Migration Policy Institute, Poynter Institute, and academic researchers including Austin Kocher.

The Investigative Chain

Journalist	Outlet	Key Contribution
Andrew Thrasher	Maxwell Commons (Substack)	287(g) data tracking, program mapping, Caney Valley exposé
Rachel Spacek	InvestigateWest (Report for America)	First to publish Owyhee County Sheriff's service agreement — revealed UAC contract language
Jules Feeney	Chattanooga Times Free Press	Exposed Bradley County constables traveling for bounty-driven 'wellness checks'; obtained the incentives document
Andy Behlen	Fayette County Record (TX)	Revealed $725,500 in federal 287(g) payments to Fayette County Sheriff; 2026 TX Reporter of the Year

The Political Machine: Key Figures Driving Expansion

Person	Role	Connection
Tom Homan	ICE 'Border Czar'	Architect of expanded 287(g) Task Force Model; 'missing children' narrative driver
Stephen Miller	Senior Advisor / America First Legal	Ideological driver of mass deportation infrastructure
Markwayne Mullin	U.S. Senator (R-OK)	Promoted the '450,000 missing children' claim
John Cornyn	U.S. Senator (R-TX)	Championed the $3B DOJ 'BIDEN' grant program requiring 287(g) participation
Ron DeSantis	Governor, Florida	Cabinet officials run the $250M State Board of Immigration Enforcement
Bill Lee	Governor, Tennessee	$75M Violent Crime Intervention Fund tied to 287(g) compliance
Greg Abbott	Governor, Texas	Signed SB 8 mandating county sheriffs to request 287(g) agreements

Federal & State Funding Streams

The expansion rests on layered appropriations that convert local law enforcement into a federal force multiplier while channeling public money into private surveillance and detention contractors.

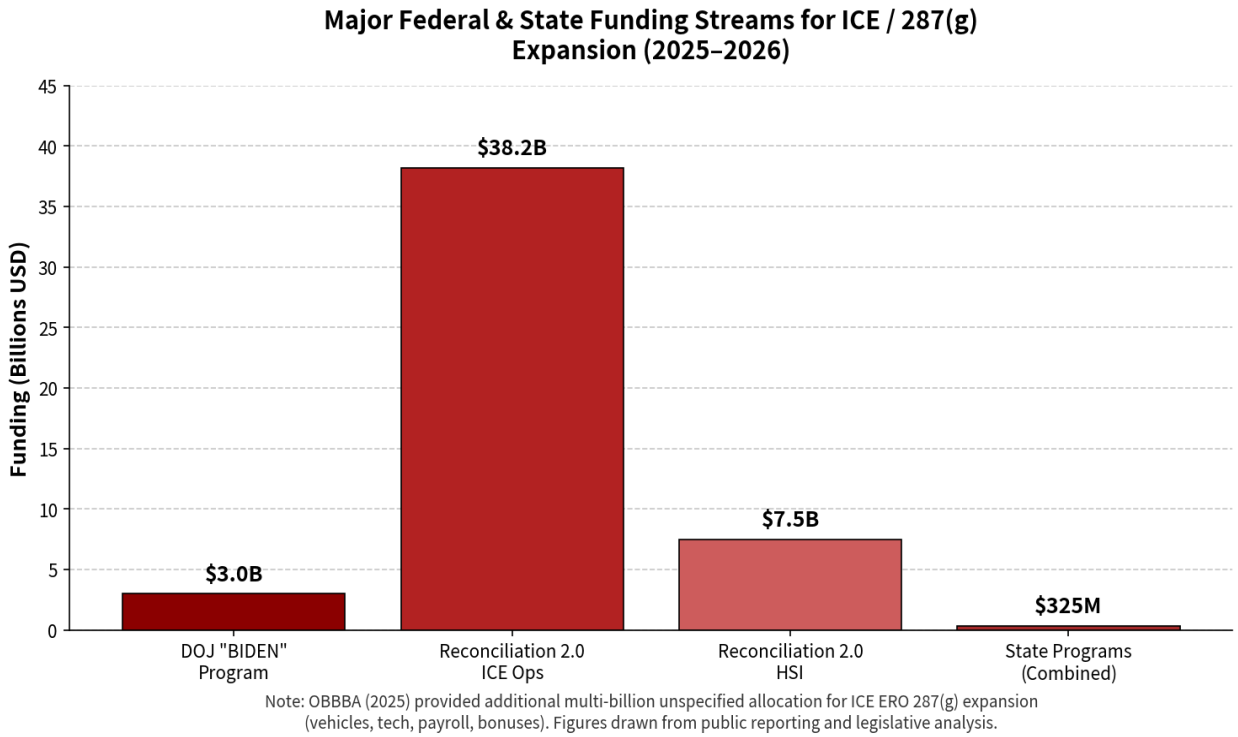

Figure 1. Major documented funding streams supporting 287(g) expansion and ICE operations, 2025–2026. OBBBA multi-billion allocation for vehicles, tech, payroll and bonuses is additional and not quantified in public line items.

The Bounty Architecture: Three-Layer Contract System

Financial incentives are deliberately distributed across three documentation layers that ICE has actively resisted releasing in full:

1. **Layer 1 — MOA (Public):** Boilerplate downloadable from ICE's website. No mention of UAC work or bounties.
2. **Layer 2 — Service Agreement (Non-Public):** Signed by each agency. Defines UAC targets as anyone 'previously in ORR custody, subsequently released, and unaccounted for.' References 'incentives.' Obtained via FOIA by InvestigateWest (Owyhee County).
3. **Layer 3 — Incentives Attachment (Unsigned Rider):** Marked UNCLASSIFIED // FOR OFFICIAL USE ONLY // LAW ENFORCEMENT SENSITIVE. Full bounty breakdown. Obtained by Jules Feeney (Bradley County constables).

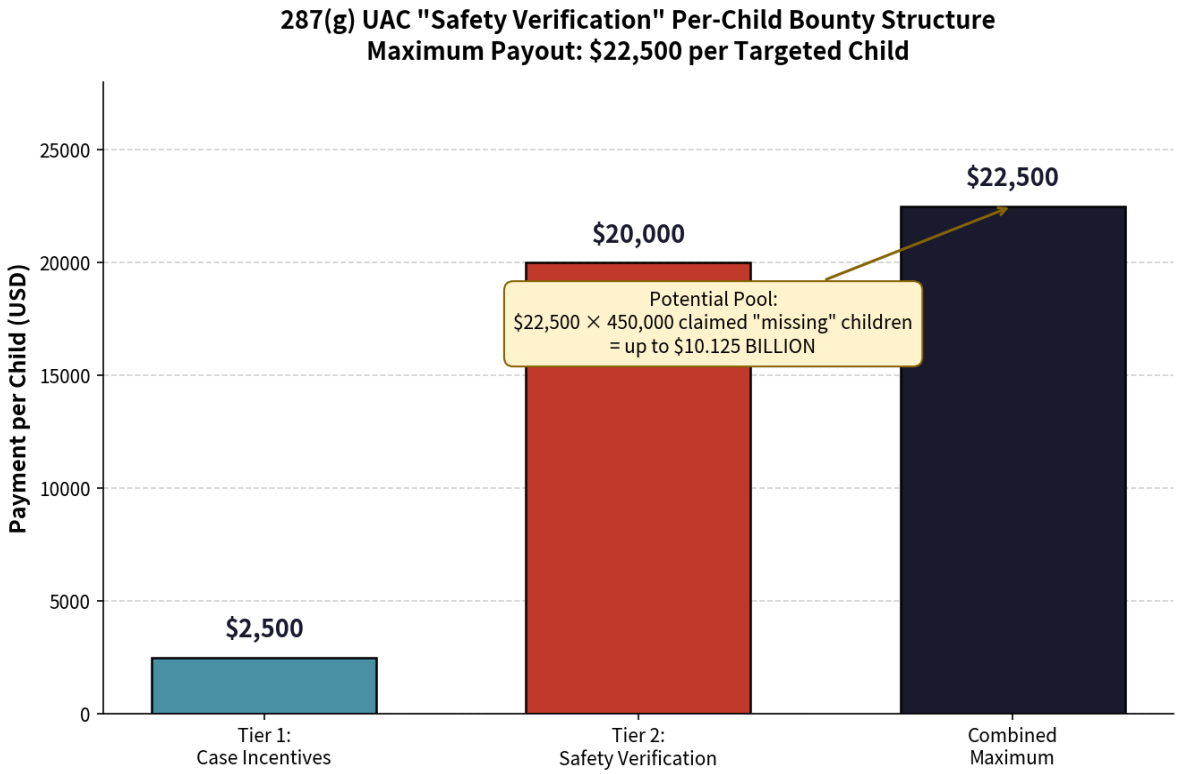

Figure 2. Tiered per-child bounty structure under the UAC Safety Verification Initiative. Combined maximum of $22,500 per child. Applied against the administration's claim of 450,000 'missing' children, the theoretical pool reaches $10.125 billion.

■ THE 'MISSING CHILDREN' PRETEXT

The entire program rests on the claim that 450,000 children are 'missing.' This is a documented distortion of an August 2024 DHS Inspector General report that described administrative tracking gaps, not missing persons. Roughly 32,000 had missed court hearings; ~291,000 had not yet been served notices to appear. Children were legally released to vetted sponsors (usually family). Contract language references 'apprehension,' not 'wellness.' Jennifer Podkul (KIND): calling them 'lost' is a 'fundamental misunderstanding' of the process. PolitiFact found the administration 'vague about what they mean by saying they have "found" hundreds of thousands of children.'

Who Profits: Private Sector Capture

Surveillance Technology

Company	Product	Role in 287(g)
Palantir Technologies	ImmigrationOS, ELITE app, ICM	Core targeting platform — dossiers and address confidence scores from merged databases including CMS Medicaid data ($30M+ April 2025)
LexisNexis	Accurint platform	Aggregates billions of records (vehicles, phones, addresses, social media) for real-time targeting
Babel Street	Babel X / Locate X	Social media monitoring; ad-tech mobile data for location tracking

Private Detention & Transport

Company	Role	Key Facts
GEO Group	Largest private ICE detention operator	Record contracts post-OBBBA; millions spent lobbying 2025–2026
CoreCivic	Second-largest private detention operator	Active lobbying on detention standards and contracts
MVM, Inc.	Private security — transporting minors	2026 contract modification to assist in UAC 'wellness checks' — blurs child welfare and enforcement

■ CRITICAL LINK

MVM, Inc. is the operational bridge between Parts I and II. Originally contracted for minor transportation, MVM received a 2026 contract modification to conduct UAC 'safety and wellness checks' — the same checks that carry the $22,500 bounty. A private security firm now performs child welfare investigations that feed into the Palantir targeting system.

Deportation Airlines (Active)

Company	Role	Status
CSI Aviation	Major air broker	Active
GlobalX (Global Crossing Airlines)	Primary contractor (>50% of flights)	Active
World Atlantic Airlines	Overflow provider	Active
Eastern Air Express / OMNI Air International	Charter providers	Active

Avelo Airlines ceased January 2026 under public pressure; Swift Air/iAero ceased April 2024 (bankruptcy). DHS is building a government-owned fleet of Boeing 737-700s and Gulfstream jets (operational July 2027).

Where the Kids Go: Documented Outcomes

Gratis, Ohio Incident (April 2026) — Most documented case of 'wellness checks' in practice: Two armed, uniformed officers from Gratis, Ohio (pop. ~1,200) — Police Chief Tonina Lamanna and Officer Jeff Baylor — drove 50 miles to Cincinnati. Arrived unannounced at three Cincinnati Public Schools. Presented a list of ~30 student names and demanded access. School officials denied access (no warrants). Aftermath: Baylor resigned, Lamanna fired, Gratis suspended 287(g) partnership, Cincinnati Mayor Aftab Pureval called it 'disgusting.'

Bradley County, Tennessee — Elected constables traveled to at least three other states under the UAC Safety Verification Initiative and earned significant financial compensation through 287(g) bounty agreements. Jules Feeney's investigation obtained the incentives document exposing the full $22,500/child structure.

Outcome	Description
Return to ORR custody	Children taken from sponsors, placed back in federal shelters/group homes/foster care
Deportation proceedings	Children with missed hearings fast-tracked for removal
Sponsor arrest/deportation	Undocumented sponsors detained — children re-enter foster/shelter system parentless
Family separation	De facto policy: children separated from caregivers through enforcement framed as welfare
Community terror	Parents stop sending children to school or accessing medical care out of fear

■ FACILITY CONDITIONS (2025–2026)

Human Rights Watch documented abuse, medical neglect, failed suicide checks, and unreported use of force. UN raised alarms over 'red rooms' — solitary confinement of minors. Stricter vetting (proof of income, expanded fingerprinting) drastically increased length of stay. ORR funding cuts produced facility closures across NY, CA, MI, IL. Statistical finding: Children in 287(g) jurisdictions are 29% more likely to have detained or deported parents.

Legal Challenges Underway

Action	Entity	Details
FOIA Lawsuit (March 2026)	American Oversight	Suing for records proving 'wellness checks' are pretext for deportation
Ongoing litigation	ACLU	Challenging prolonged child detention; demanding transparency
Public advocacy	KIND, Young Center	Urging Congress to intervene
Contract termination	Acacia Center for Justice	Legal services contract for UACs terminated March 2026 — reducing children's access to lawyers

PART II: THE CMS–ICE–PALANTIR DATA BRIDGE

Verification Status

Claim	Verdict
July 2026 filings revealed CMS Medicaid records ingested into Palantir ELITE	VERIFIED
Case before Judge Vince Chhabria (N.D. Cal.)	VERIFIED
California Deputy AG Anna Rich is lead litigator	VERIFIED
HSI Section Chief Alberto Briseno declared 'technological difficulties'	VERIFIED
Microsoft Teams used to transfer bulk Medicaid datasets	VERIFIED
Millions of records including U.S. citizens fed into ELITE	VERIFIED

Case Timeline

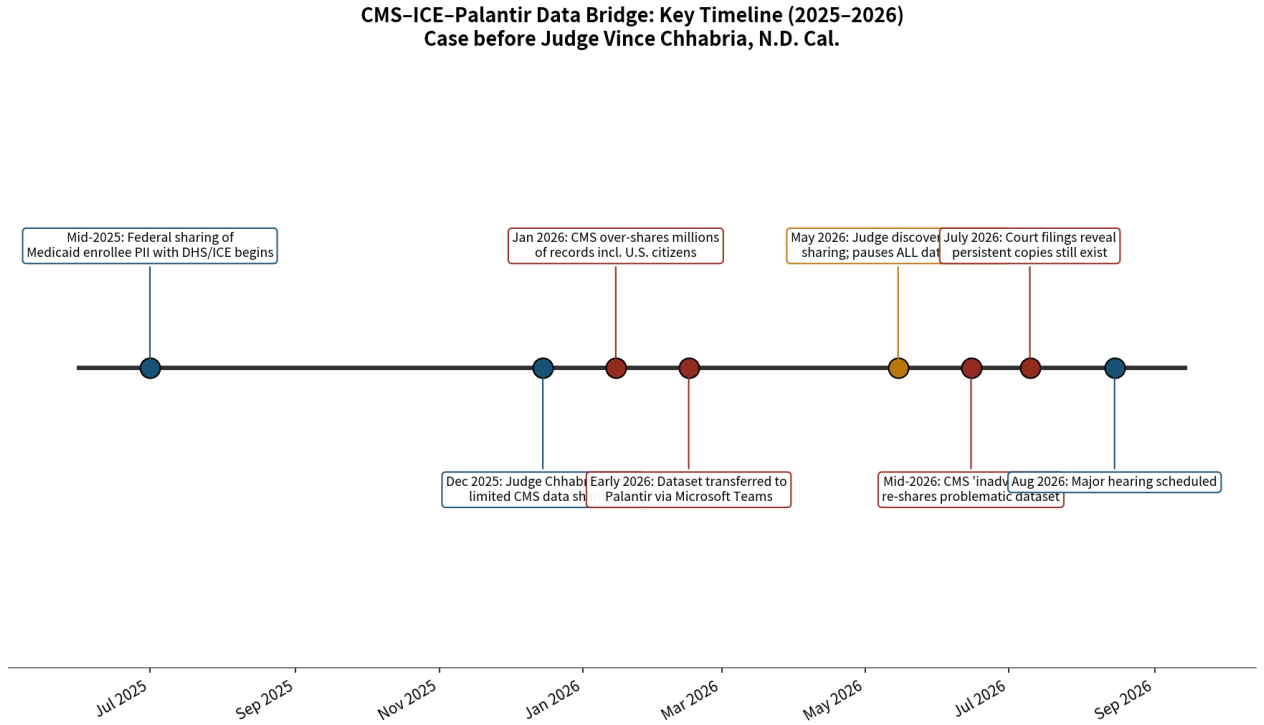
CMS–ICE–Palantir Data Bridge: Key Timeline (2025–2026)
Case before Judge Vince Chhabria, N.D. Cal.
Mid-2025: Federal sharing of Medicaid enrollee PII with DHS/ICE begins
Jan 2026: CMS over-shares millions of records incl. U.S. citizens
May 2026: Judge discover sharing; pauses ALL dat
July 2026: Court filings reveal persistent copies still exist
Dec 2025: Judge Chhab limited CMS data sh
Early 2026: Dataset transferred to Palantir via Microsoft Teams
Mid-2026: CMS 'inadv re-shares problematic dataset
Aug 2026: Major hearing scheduled
Jul 2025
Sep 2025
Nov 2025
Jan 2026
Mar 2026
May 2026
Jul 2026
Sep 2026

Figure 3. Key events in the CMS–ICE data-sharing litigation before Judge Vince Chhabria. August 2026 major hearing remains a critical inflection point for purging orders and future sharing scope.

Key People

Name	Role	Significance
Judge Vince Chhabria	U.S. District Judge, N.D. Cal.	Presiding over 20+ AG lawsuit; issued May 2026 pause; 'If the federal government cannot be sufficiently careful then it can't use the information, ok?'
Anna Rich	California Deputy AG	Lead litigator; presented Teams chat transcripts proving ICE directed Palantir to delete files
Alberto Briseno	HSI Section Chief	Declared 'technological difficulties' in locating/destroying data copies

Technical Reality: Why 'Complete Deletion' Is Architecturally Near-Impossible

When a massive CMS dataset was dropped into a Microsoft Teams chat between ICE personnel and Palantir engineers, the file immediately proliferated across 15+ persistent locations. Microsoft 365 is designed for data resilience, not destruction. 'Delete' removes a UI pointer. The binary persists across microservices, compliance substrates, geographic replicas, and endpoint caches.

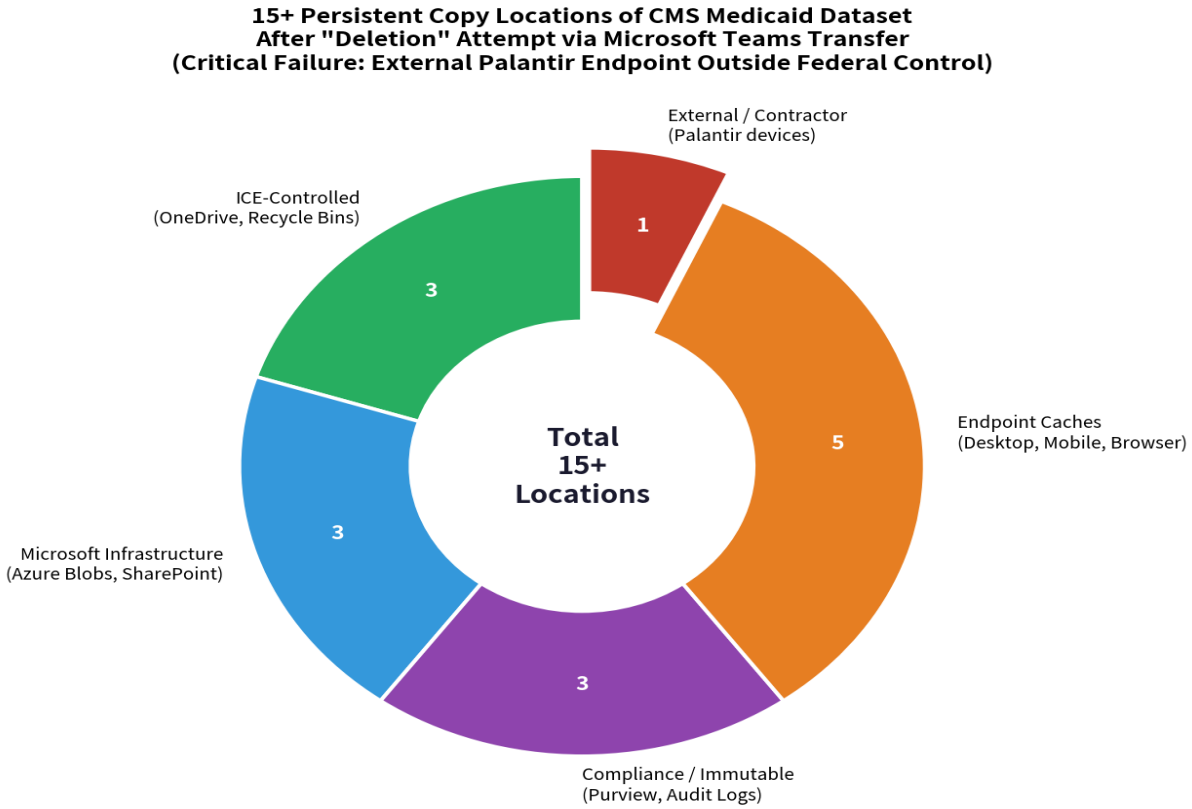

Figure 4. Approximate distribution of persistent copies after a Teams-mediated transfer of the CMS Medicaid dataset. Row critical: once opened on a Palantir contractor device, the file left the federal tenant entirely. ICE cannot remotely wipe a contractor laptop.

Federal retention frameworks actively fight deletion: Federal Records Act / NARA, eDiscovery Litigation Holds (files silently moved to immutable Preservation Hold Libraries), Purview Retention Policies (3–7 year blankets), Azure Backup / Geo-Redundancy (point-in-time backups up to 30 days post-logical deletion). Briseno's 'technological difficulties' claim is technically accurate and strategically convenient — converting potential contempt into bureaucratic friction.

Palantir ELITE: From Medicaid CSV to Map Pin

Ingestion pipeline: (1) Parsing & schema mapping of CMS columns (name, DOB, address, SSN, enrollment status, eligibility category) into Gotham objects; (2) Dual-mode entity resolution — deterministic (exact SSN/A-number) and probabilistic (Jaro-Winkler / Levenshtein on name+DOB); (3) Geocoding of Medicaid addresses into lat/long pins; (4) Confidence scoring weighted by address recency, source reliability (CMS = elevated trust), and cross-database corroboration.

■ THE CITIZEN DATA PROBLEM — 'GUILT BY ADDRESS'

Without citizenship flags, probabilistic matching can erroneously merge U.S. citizen profiles with enforcement targets. Gotham creates persistent Lives_At links: a target's former address now occupied by a citizen retains risk association. No documented mechanism in ELITE automatically excludes records tagged 'U.S. Citizen' from the enforcement pipeline. Field agents see map pins, fused dossiers with source tags (e.g., Source: CMS_MEDICAID_2026), and prioritized lists pushed by supervisors. Offline mode caches encrypted SQLite dossiers on devices.

The Mutation Protocol: Data Laundering Through Transformation

Once ingested, the original CSV is transformed: parsed into Foundry schema-mapped data, entity-resolved and merged with existing ICE records, decomposed into Gotham ontology objects + edges, scored, queried, and pushed as device caches. Result: ICE can truthfully testify the 'original file' was deleted. All actionable intelligence persists across ontology objects,

derived analytics, and device caches — none matching the original hash. Palantir Foundry's own documentation advertises data provenance and lineage tracking as a core feature. If derivatives cannot be located, it is because the tools are not being used.

Governance by Instant Message

Anna Rich's presentation of Teams chat transcripts showing ICE directing Palantir to 'delete' establishes scienter: ICE knew its obligation. Handling PII/PHI for millions via chat rather than secure auditable pipelines is governance theater. The chat proves Palantir's forward-deployed engineers act as active data custodians, not passive vendors.

Sanctuary State Bypass Architecture

State health data → federal CMS (mandatory reporting) → ICE (federal-to-federal) → Palantir (federal-to-contractor) → ELITE on a 287(g) officer's phone. The data never touches any state or local system, so sanctuary laws are technically not violated — while local cops access health-sourced targeting data their own jurisdictions forbid them from collecting. HIPAA carve-outs for administrative (vs. clinical) data and law-enforcement exceptions, combined with OBBBA authorization, further erode barriers. Once merged in Palantir, health-data origin becomes forensically untraceable.

PART III: THE CONVERGENCE — ONE MACHINE

These are not separate programs. They are interlocking components of a single enforcement architecture that converts administrative tracking gaps into a paid, data-driven, privatized manhunt for children and their sponsors.

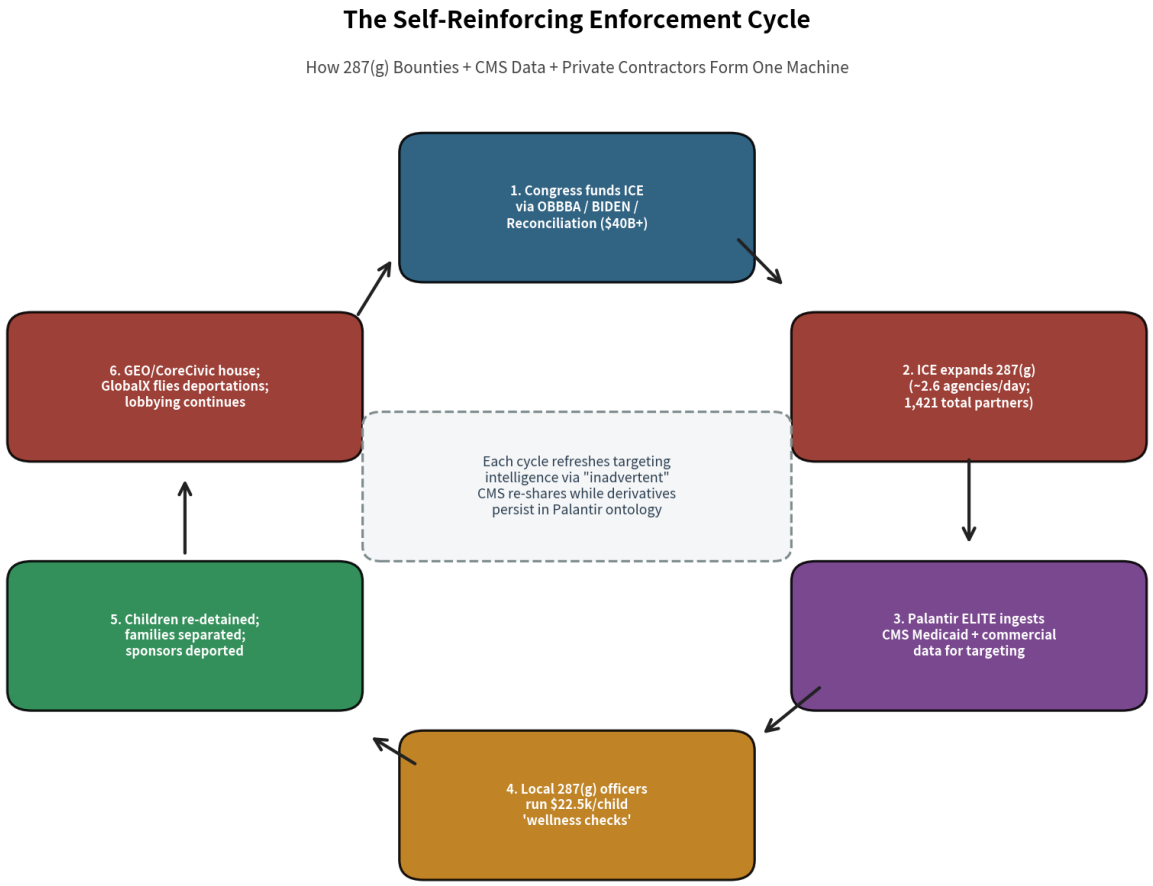
The Self-Reinforcing Enforcement Cycle
How 287(g) Bounties + CMS Data + Private Contractors Form One Machine
1. Congress funds ICE via OBBBA / BIDEN / Reconciliation ($40B+)
2. ICE expands 287(g) (~2.6 agencies/day; 1,421 total partners)
3. Palantir ELITE ingests CMS Medicaid + commercial data for targeting
4. Local 287(g) officers run $22.5k/child 'wellness checks'
5. Children re-detained; families separated; sponsors deported
6. GEO/CoreCivic house; GlobalX flies deportations; lobbying continues
Each cycle refreshes targeting intelligence via "inadvertent" CMS re-shares while derivatives persist in Palantir ontology

Figure 5. The closed loop: appropriations → local force multiplication via 287(g) → Palantir targeting fed by CMS and commercial data → bounty-driven 'wellness' interventions → detention and deportation contracts → lobbying for the next funding cycle. Fresh CMS data continues to refresh the targeting pool while derivatives persist.

Complete Entity Map

Government

Entity	Role
ICE ERO	Operational lead; signs 287(g) MOAs; manages ELITE deployment
CMS	Source of Medicaid enrollment data; shared 'inadvertently' with ICE
DOJ	Legal defense; filed counter-motions to broaden data access; manages BIDEN grants
DHS	Parent agency; allocated $38.2B in Reconciliation 2.0
ORR	Houses UACs in custody; funding being cut
1,421 local agencies	287(g) Task Force partners — sheriffs, police, constables

Private Sector

Company	Revenue Stream	Connection
Palantir	$30M+ ImmigrationOS contract	Builds/operates ELITE; forward-deployed engineers as data custodians
GEO Group	Billions in detention contracts	Largest private ICE detention operator; active lobbying
CoreCivic	Billions in detention contracts	Second-largest; active lobbying
GlobalX	Deportation flight charter	Operates >50% of ICE deportation flights
CSI Aviation	Air brokerage	Principal charter broker for ICE Air Operations
MVM, Inc.	Security + UAC transport	2026 modification: bounty-eligible 'wellness checks'
LexisNexis / Babel Street	Data & location analytics	Commercial inputs to ELITE; tools for 287(g) officers
Ballard Partners	Lobbying	Trump-connected firm representing enforcement contractors

Judiciary & Advocacy

Entity	Role
Judge Vince Chhabria	Presiding over CMS–ICE data case; paused sharing May 2026
20+ Democratic AGs	Plaintiffs in CMS–ICE lawsuit
Anna Rich (CA Deputy AG)	Lead litigator; presented Teams chat evidence
American Oversight	FOIA lawsuit challenging UAC 'wellness check' pretext
ACLU / KIND / Young Center	Child detention challenges and advocacy

Systemic Risk If Normalized

Risk Domain	Impact
Public Health	Immigrants stop accessing healthcare → disease tracking collapses, vaccination rates drop, preventable conditions become ER emergencies
Education	Families pull children from school after Gratis-style incidents → educational disruption for hundreds of thousands
Institutional Trust	ALL federal safety-net programs (Medicaid, SNAP, WIC, housing) viewed as surveillance traps
Precedent	Any federal benefits registry can be legally co-opted as a geospatial targeting layer
Child Welfare	'Wellness checks' at $22,500/child create financial incentive to maximize interventions, not protect children
Constitutional	Fourth Amendment concerns with warrantless health data use for enforcement; due process issues with probabilistic targeting of citizens

Upcoming Critical Dates

Date	Event	Significance
July 15, 2026	DOJ BIDEN grant applications due	First round of $3B in 287(g) grants
August 2026	Judge Chhabria hearing	Resolution of data purging, sanctions for persistent copies, scope of future CMS–ICE sharing
December 2026	Texas SB 8 compliance deadline	Counties that haven't signed 287(g) may be sued by TX AG
July 2027	Government deportation fleet operational	DHS fleet of Boeing 737-700s and Gulfstreams replaces charter contractors

SOURCE INDEX

Primary Investigative Sources

- Maxwell Commons (Andrew Thrasher) — maxwellcommons.substack.com — 287(g) data tracking, program mapping
- InvestigateWest (Rachel Spacek) — Owyhee County Sheriff 287(g) service agreement
- Chattanooga Times Free Press (Jules Feeney) — Bradley County constables; UAC incentives document
- Fayette County Record (Andy Behlen) — Federal 287(g) payments to Texas agencies

Court Filings & Legal Documents

- Multi-State AG Coalition v. CMS/ICE — N.D. Cal. (Judge Chhabria)
- UAC Safety Verification Initiative Incentives Program (PDF)
- Alberto Briseno declarations (HSI)
- Anna Rich court presentations (CA Deputy AG)

Fact-Checking & Policy Analysis

- PolitiFact — 'Missing children' claim analysis
- American Immigration Council — Reconciliation bill analysis
- Migration Policy Institute — 287(g) program tracking
- Human Rights Watch — 2026 facility conditions investigations

Advocacy & Legal Challenges

- American Oversight — FOIA lawsuit (March 2026)
- KIND (Kids in Need of Defense) — Jennifer Podkul statements
- ACLU — Child detention litigation
- Young Center — Child advocacy

Government Oversight

- Project on Government Oversight (POGO) — Ballard Partners scrutiny
- DHS Inspector General — August 2024 UAC tracking report

This dossier maps material infrastructure, not abstract policy debate. The 287(g) bounty system and the CMS–ICE–Palantir pipeline are interlocking components of a single architecture that privatizes the hunt for children while laundering health data into targeting intelligence. The machine is funded, contracted, staffed, and expanding. The only open question is whether courts, legislatures, or organized resistance interrupt the cycle before the next round of 'inadvertent' data shares and the next wave of bounty-driven interventions.

— End of Dossier —